

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Hearing Date: June 25, 2025 at 9:30 A.M. ET

Objection Deadline: June 11, 2025 at 4:00 P.M. ET

Ref. Nos. 30315, 30339 & 31052

**SUPPLEMENTAL CERTIFICATION OF COUNSEL REGARDING  
FTX RECOVERY TRUST’S ONE HUNDRED SEVENTY-FIFTH  
(SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN  
MISCLASSIFIED CLAIMS (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to the FTX Recovery Trust,<sup>2</sup> hereby certify as follows to the best of my knowledge, information and belief:

1. On April 28, 2025, the FTX Recovery Trust filed the *FTX Recovery Trust’s One Hundred Seventy-Fifth (Substantive) Omnibus Objection to Certain Misclassified Claims (Customer Claims)* [D.I. 30315, redacted & 30339, sealed] (the “Objection”).

2. On June 26, 2025, the FTX Recovery Trust filed a revised proposed form of order (the “Revised Order”) for the Objection under Certification of Counsel [D.I. 31052] reflecting certain agreements, revisions, or adjournments with respect to parties’ claims.

3. The informal response to the Objection with respect to claim number 1660 did not dispute the proposed modification of claim number 1660 as set forth in the Objection and the form

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

of order attached thereto.

4. For the Court's convenience, a copy of the Revised Order is attached hereto as **Exhibit A**. In accordance with the Court's electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

5. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Revised Order at its earliest convenience.

Dated: July 1, 2025  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

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